

14th March 2003

Attention Marie Long
Fiordland National Park Management Plan
Department of Conservation
Private Bag 743
Invercargill

mlong@doc.govt.nz

Dear Marie

Draft Fiordland National Park Management Plan.

Thank you for the opportunity to comment on the Draft Fiordland National Park Management Plan.

The Tourism Industry Association New Zealand (TIANZ) supports the concept of developing management plans based on consultation with parties likely to be affected.

However we note that in the preparation of the draft there has been, in our view, inadequate consultation with key stakeholders. We have previously raised, in other arenas, the need for the Department to work more closely with key stakeholders such as concessionaires. We would urge the Department, both at a local and national level to facilitate a closer working liaison with all concessionaires and their national bodies at all stages of Plan preparation. The calling for submissions, by the Department, during the busiest period of the tourism season, is not an example of adequate consultation.

We also raise a fundamental question as to why a national park management plan must consist of over two hundred pages. TIANZ suggests that each national park plan should contain a common core of national agreed objectives and principles, and then any additional material that relates specifically to the National Park in question.

In general, TIANZ notes the draft Plan's distinctively prescriptive nature. TIANZ has previously commented on the need for a consistent approach from the Department to the development of statutory management plans. TIANZ does not support a prescriptive approach to management planning as used throughout the Draft Fiordland National Park Management Plan.

Best practice in resource / conservation management planning is largely generic and based on "effects" based planning. Given that concessionaires operate in a number of national parks, and that visitors would expect consistency in national park management, TIANZ supports the latter approach throughout statutory management planning processes within the Department.

We appreciate the extension in time given to us to comment on the draft Plan and look forward to discussing the issues raised both in this covering letter and in our detailed comments.

Yours sincerely

David Barnes
Policy Manager
Tourism Industry Association New Zealand (TIANZ)

COMMENTS ON THE DRAFT

FIORDLAND NATIONAL PARK MANAGEMENT PLAN.

A Introduction

These comments on the Draft Fiordland National Park Management Plan are from the Tourism Industry Association New Zealand (TIANZ).

TIANZ is a membership-based organisation representing the interests of over 3,500 tourism businesses that collectively generate around 80% of all revenue associated with the tourism industry. The TIANZ seeks to provide leadership, guidance and appropriate services for the benefit of its members in order to contribute to a viable and sustainable tourism industry. To help achieve this TIANZ has set a number of goals, including:

- 1.1. to enhance the environmental sustainability of the tourism industry by encouraging improved environmental management practices at strategic and operational levels;
- 1.2. to assist in strengthening the financial performance of operators by working for reductions in industry compliance costs and encouraging industry best practices to improve margins;
- 1.3. to facilitate the development of an economic and regulatory environment that encourages innovation and development in tourism and that continues to attract funding from the public and private sectors; and
- 1.4. to improve the standard of visitor products and services and the quality of the visitor experience by facilitating the development of quality tourism standards in relevant sectors of the industry.

The tourism industry is New Zealand's largest export earner with international visitors directly contributing \$ 4.9 billion to the New Zealand economy in the year ended 31 March 2001. Total tourism expenditure in the year ending March 2000 (i.e. including domestic tourism) was \$13.2 billion. The industries direct and indirect contribution to GDP in 2000 was 9.7% of total GDP. One in ten jobs in New Zealand is generated by tourism.

The tourism industry is made up of a large number of small and medium sized enterprises (over 80% of the businesses in the industry employ less than 5 people) and a few large corporations (including ten listed companies).

The tourism industry consists of a highly diverse range of operators, from listed airline and airport companies, to bed and breakfast and home stays, and from bungee jumping and rafting operations, to research based organisations.

Issues that relate to compliance costs and requirements that necessitate resources being directed away from productive uses, are of significant importance. Therefore, in assessing the draft Plan, TIANZ has also paid close attention to the impact potential policies will have on compliance, transaction and infrastructure costs facing businesses.

TIANZ's response to the Draft Fiordland National Park Management Plan recognises the above features.

B New Zealand Tourism Strategy 2010

TIANZ has recently, in partnership with Government and other stakeholders, developed a National Tourism Strategy for New Zealand. The Department of Conservation was one of the stakeholders in the Strategy Working Group.

Key strategic projects based on principles of sustainable development identified in the Strategy include:

- * Defining of industry infrastructure requirements and constraints
- * Preparation and development of an investment and development strategy

- * Identifying opportunities to improve the quality of the visitor experience
- * Development of Green Globe 21 as the environmental standard for the industry
- * Development of Quality Tourism Standards across all sectors of the industry

The following principles relate to our comments on the document Draft Fiordland National Park Management Plan:

- * Acknowledgement that commercial tourism operations will play an important part in the implementation of any decisions based on outcomes of the Plan
- * The development of any subsequent policies, rules or regulations need to be based on adequate assessment of risks, the costs and benefits of proposed options and the practical application of such regimes.
- * Consultation with all key stakeholders should be the cornerstone of any decisions involving tourism-related issues.

TIANZ generally supports the development of strategies based on local input but based on agreed national principles. TIANZ believes any decisions or recommendations on the Draft Fiordland National Park Management Plan need to reflect, where relevant, industry agreed principles, methodology and implementation methods.

TIANZ also believes that any solutions to industry issues must be cost effective and demonstrate sustainable economic, social and environmental benefits to all stakeholders.

C Tourism and the Environment

The tourism industry directly benefits from a high level of environmental quality and biodiversity. Natural features and environments represent an important component of the New Zealand tourism product and the marketing of that product.

Tourism is also able to contribute to enhancing and maintaining environmental quality - through the creation of an economic value for the environment, through environmental interpretation, increasing visitor awareness and support for the environment and sound environmental practices.

One of the three new visions for tourism succinctly sums up the relationship between tourism and the environment when it states: "*New Zealanders' environment and culture is conserved and sustained in the spirit of kaitiakitanga*".

In general TIANZ's comments in this submission are restricted to those that of importance to the principles of sound economic, environmental and social sustainability for the wider tourism industry. Comment on specific issues relating to this Plan e.g. Milford Sound Village are better left to individual businesses.

3.0 Issues and Comments

The TIANZ's comments on the draft Fiordland National Park Management Plan are outlined below:

3.0 Conservation Management

3.2 *Conservation Audit*

TIANZ notes the comment that "*preservation of these natural features and values requires some active management, principally to prevent, minimise or redress human-induced impacts*".

TIANZ notes that the only mention of human interface with conservation management in the "Audit" is that which refers to Historic Sites and Heritage. An audit should cover the full gambit of the human interface with conservation management.

Action Requested

TIANZ seeks the inclusion of a section in the audit on the relationship between human interface and conservation management. Such comment must include acknowledgment of the positive role human interaction, particularly concessionaire tourism, can have on conservation management.

The Department is well aware of the positive contributions concessionaire tourism makes to conservation management and this should be acknowledged in the audit.

3.3 Conservation of Indigenous Species and Habitats

TIANZ supports the nature and purpose of the Objectives and Implementation measures in this section.

Action Requested

TIANZ seeks to retain the Objectives and Implementation methods in this section.

3.4 Introduced Animals

TIANZ understands the objectives and believes that implementation measures must rely more on integration and co-ordination between DOC and other user groups than is emphasised.

TIANZ believes there is considerable scope for more accountability from user groups that have interests-commercial or recreational-in controlling introduced species such as deer and pig, otherwise the objectives are supported.

Action Requested

TIANZ seeks to retain the Objectives and Implementation methods in this section.

3.5 Introduced Plants

TIANZ supports the nature and purposed of the Objectives and Implementation measures in this section.

Action Requested

TIANZ seeks to retain the Objectives and Implementation methods in this section.

3.6 Introduced Plants

TIANZ supports the majority of the proposed Objectives and Implementation measures in this section.

TIANZ does not support the current wording of Objective 6, which seeks to “...*protect the inshore waters adjoining the park*”.

As a consequence of this, TIANZ cannot support Implementation 12 which seeks to “...*manage the intertidal zone on a comparable basis.....*”.

Both the current objective and the implementation method fail to positively re-enforce the cross boundary issues between the Department, Southland Regional Council and the Southland District Council.

Action Requested

TIANZ seeks to retain the Objectives and Implementation methods in this section with the exception of Objective 6 and Implementation method 12.

Objective 6 should be re-worded to state “*protect the inshore waters adjoining the park by ensuring that integration with the Proposed Southland Regional Council Coastal Plan and the Southland District Council District Plan is implemented*”.

Implementation method 12 should be re-worded to state “*...manage the intertidal zone by ensuring that integration with the Proposed Southland Regional Council Coastal Plan and the Southland District Council District Plan is implemented*”.

3.7 Island Management

TIANZ supports the nature and purpose of the Objectives and Implementation measures in this section.

TIANZ notes that tourism concessionaires already access predator free islands in other parts of the country. TIANZ supports access by tourism concessionaires to appropriate predator free islands within Fiordland National Park.

TIANZ notes that tourism concessionaires should, at the least, be given equal access to any predator free islands open to the public. The potential conservation gains for allowing this process are documented under 4.9 and in our introductory comments.

Action Requested

TIANZ seeks to retain the Objectives and Implementation methods in this section.

TIANZ supports provision of access by tourism concessionaires to appropriate predator free islands during the life of this Plan. Any practical restrictions on tourism concessionaires to such islands should be set at a nationally consistent level.

TIANZ seeks equal access by tourism concessionaires to any predator free islands also open to the public.

3.9 Ecosystem Management, Survey and Monitoring

TIANZ supports the nature and purpose of the Objectives and Implementation measures in this section.

TIANZ notes Objective 5 seeks to integrate ecosystem condition with monitoring of visitor use. While supporting the concept TIANZ is aware of the difficulties in achieving such an aim – particularly when trying to distinguish between concessionaire tourism and other visitors to Public Conservation lands. TIANZ further notes that the Department must work closely with tourism concessionaires in order to facilitate such integration.

Subsequent to the above TIANZ does not support the wording of Implementation method 12.

Action Requested

TIANZ seeks to retain the Objectives and Implementation methods in this section.

TIANZ seeks the re-writing of Objective 5 to read: “*Integrate the monitoring of ecosystems conditions with the monitoring of both tourism concessionaire and other visitors use of Public Conservation Lands, so that specific impacts applicable to each category can be recognised and managed*”

TIANZ seeks the re-writing of Implementation method 12 to read “*...Monitor ecosystems conditions so that specific impacts applicable to both tourism concessionaire and other visitors to Public Conservation Lands can be specifically recognised and managed*”

3.11 Historic Resources Conservation

TIANZ supports the nature and purposed of the Objectives and Implementation measures in this section.

TIANZ notes that tourism concessionaires, by the virtue of their concession document, and their ability to instil an understanding of the nature and values of these historic resources should be key partners in interpreting these values to visitors.

Action Requested

TIANZ seeks to retain the Objectives and Implementation methods in this section.

TIANZ seeks further comment in this section of the potential importance of tourism concessionaires to furthering the Department's aims for Historic Resources Conservation through quality interpretation.

4.0 Recreation and Tourism Management

4.1 *Planning Rationale*

TIANZ notes the use of the terms recreation/tourism activities, recreation and tourism, and recreation/tourism management. We suggest this term is replaced by visitors which is in essence what these people are. This is consistent with the term used in the New Zealand Tourism Strategy 2010, of which the Department was a key stakeholder.

TIANZ agrees that a component of the areas importance is wilderness of "*national and international significance*". However we note that the Department needs to be careful that it does not impose its "*wilderness*" values on visitors whether they be national or international. "*Wilderness*" means many things to many people and the comment in the text that "*the effects of recreation and tourism must be considered in this context*" is considered subjective.

TIANZ wishes the Department to include a new paragraph in the Plan under this section outlining how tourism concessions can have positive outcome for conservation management.

Action Requested

TIANZ seeks the deletion of the terms recreation/tourism, recreation and tourism, and recreation/tourism management and their replacement with the term visitor (activities/management etc. as appropriate).

TIANZ seeks the insertion of a new sentence at the end of paragraph three, on page 66. This sentence is to read "*The Department does however acknowledge that "wilderness" is a subjective concept and is dependent on the marketing of a product, such as Fiordland National Park, and the expectations and prior experience the visitor brings with them to the specific experience.*"

TIANZ wishes the Department to include a new paragraph in the Plan under this section. The new paragraph is to read:

Tourism concessions can have positive outcome for the Park. Economically visitors to the Park sustain both local (Te Anau) and the wider community (Southern Lakes). Visitor (international and domestic) expenditure is forecast to grow in the Southland region, including Fiordland, from \$ 250 million to \$ 360 million by 2008 (source www.trcnz.govt.nz)

Environmentally concessionaires can play an important role in portraying conservation values to Park visitors. In social terms tourism concessionaire activities foster access to parts of the National Park across a wide spectrum of users. Tourism concessionaires are important in fostering National Park values to both domestic and international visitors. Concessionaire fee revenues to the Department from activities in Southland Conservancy, the majority of which are from Fiordland National Park, amounted to \$ 867,000 in the 2001/02 financial year.

4.2.1 Park Visitor and Tourism Trends

TIANZ supports the need for Department to develop and implement appropriate databases, and monitoring mechanisms for visitor activities and use. The Department must use information gained from such sources in an objective manner to make decisions based on the best environmental, economic, and social outcomes for the Fiordland “community”.

Action Requested

TIANZ seeks the insertion of the following sentence in paragraph 2 page 71: “ *The Department will engage with stakeholders in developing and implementing appropriate databases, and monitoring mechanisms for visitor activities and use.*”

4.2.2 Access

TIANZ notes the comment that “...*the challenge for park management is to ensure management between the water/land interface is consistent*”. TIANZ believes that in the interests of integrated management this sentence needs to be restated.

TIANZ notes with concern that the current draft does not effectively integrate management practices on the boundary between land, air and sea. For example a cruise ship legitimately operating under a consent from the Southland Regional Council may be in conflict with the zoning (e.g. wilderness) suggested under this draft. We further note that the draft fails to integrate legitimate current use (e.g. cruising on a fiord), and the subsequent limits, preferring to “*advocate on the zoning of adjacent land*”.

Action Requested

TIANZ seeks the replacement of the above sentence with the following “...*park management, between the water / land interface must be integrated and seamless.*”

TIANZ seeks acknowledgement in the section on Access, that the draft Plan will outline processes actively seek to integrate with existing management practices and regimes, enacted by other statutory authorities such as Southland Regional Council, Civil Aviation and Southland District Council.

4.2.4 Visitor Impacts

TIANZ notes the comment “...*that increasing growth in visitor numbers is resulting in adverse effects in places.*” While generally agreeing that the issues listed have the potential to impact on the visitor experience, TIANZ notes there is no research evidence listed that suggests these are issues now, or will become major issues over the life of this Plan. We further note that many of the issues listed reflect use of public conservation lands by non-tourism concessionaires i.e. other visitors.

Action Requested

TIANZ seeks the listing of the research that supports the list of visitor impacts on pg 75, particularly those involving visitor perceptions. TIANZ further seeks clarification as which impacts are generated by tourism concessionaires and which are generated by other visitors.

4.3 Visitor Settings

TIANZ notes the Department’s national Visitor Strategy is used in defining visitors to the Park. TIANZ is already on record as noting the inappropriateness of some of these visitor settings.

We note that none of the groups incorporate water based users, air based users and in particular effectively ignore major sections of visitors to Fiordland. We further note that the current draft does not effectively integrate management practices on the boundary between land, air and sea. For example a cruise ship legitimately operating under a consent from the Southland Regional Council may be in conflict with the zoning (e.g. wilderness) suggested under this draft. We further note that the draft fails to integrate legitimate current use (e.g. cruising on a fiord), and the subsequent limits, preferring to “advocate on the zoning of adjacent land”.

Action Requested

TIANZ seeks the insertion of the following comment in each of the visitor descriptions of Day Visitors, Overnighers, Backcountry Comfort Seekers and Backcountry Adventurers “*A key component of the visitor makeup in this category is that of sea or lake borne visitors*”.

TIANZ seeks acknowledgement in this section, that the draft Plan will actively seek to integrate with existing management practices and regimes, enacted by other statutory authorities such as Southland Regional Council, Civil Aviation and Southland District Council.

4.3.2 Recreation Opportunities

TIANZ notes the comment “*that visitor settings have been developed according to New Zealand values and expectations*”. TIANZ acknowledges that over 60% of all tourism in New Zealand is domestic. We further note the Department’s acknowledgment of the international significance of the park. However we have yet to sight evidence from the Department that supports the claims that these visitor settings have been developed according to New Zealand values and expectations.

We note that none of the groups incorporate water based users; air based users and in particular effectively ignore major sections of visitors to Fiordland. We further note that the current draft does not effectively integrate management practices on the boundary between land, air and sea. For example a cruise ship legitimately operating under a consent from the Southland Regional Council may be in conflict with the zoning (e.g. wilderness) suggested under this draft. We further note that the draft fails to integrate legitimate current use (e.g. cruising on a fiord), and the subsequent limits, preferring to “*advocate on the zoning of adjacent land*”.

TIANZ supports mechanisms for measuring impact and methods for addressing resulting issues. There are a number of suitable frameworks to such an approach (McCool and Stanley et al) – these include acknowledging that:

- The interface between tourism and the environment involves primarily social questions as opposed to biotechnical ones
- Avoid the excessive reductionistic and limited perspective provided by carrying capacity based approach
- Include the wide range of stakeholders affected by tourism development choices in the planning and management processes.

We further note that many of the areas noted in the visitor settings are naturally constrained by topography.

The suggested settings do not reflect the use or potential use of these areas by all visitors. There is evidence from a range of sources that some groups of visitors have a number of effects both on environmental and social components. In contrast concessionaires operate under a Department driven system that seeks to manage and mitigate associated effects.

Neither TIANZ nor the tourism industry have ever been amongst groups canvassed over the appropriateness of the Recreational Opportunity Spectrum (ROS). Most of the support mentioned is from recreational users and some academics. We note that the draft Plan has effectively failed to engage the tourism industry in discussions over the implementation of planning processes such as ROS.

We further note that the Visitor Settings used in this Plan effectively overlook the biggest users (in terms of numbers) of the park. Many visitors to Fiordland are day visitors to one of the three key destinations – their motivations, aspirations and perceptions are not captured by the current range of visitor settings.

Action Requested

TIANZ seeks evidence from the Department that supports the claims that these visitor settings have been developed according to New Zealand values and expectations.

TIANZ seeks acknowledgement in this section, that the draft Plan will actively seek to integrate with existing management practices and regimes, enacted by other statutory authorities such as Southland Regional Council, Civil Aviation and Southland District Council.

TIANZ seeks clarification of how the Department intends to manage the suggested limits.

TIANZ does not support the prescriptive approach taken in this section. Concession applications across all settings should be judged on potential effects (if any) on the environmental, social and cultural setting. The prescriptive approach should be deleted and replaced with an effects based approach.

With reference to tourism use, other than through concessionaire activities, TIANZ has seen no evidence that suggests there are issues with crowding across any of the visitor settings.

TIANZ seeks clarification on how the Department intends to manage non-concessionaire use (other visitors) across the range of visitor settings.

TIANZ seeks the definition of the term's tourism concessionaire and visitor, and the addition of such to the Glossary.

TIANZ seeks the deletion of the words "*it (Recreational Opportunity Spectrum) has been developed according to New Zealand values and expectations*" and their replacement with "*it has some national credibility but the Department is yet to engage the tourism industry in discussions on its appropriateness.*"

TIANZ seeks the insertion of a new visitor setting, or alternatively changes to the existing settings, to ensure that the majority of users (day visitors) motivations, aspirations and perceptions are included in the current range of visitor settings.

4.4 Recreation and Tourism Concessions

TIANZ supports Objectives 1 (with word change) and 2.

TIANZ supports Implementation Measures 1, none of 2, part of 3, none of 4 (these are already requirements of a concession and are superfluous to this Plan), none of 5, 6, 7 (but see note below), none of 9 (these are already requirements of a concession and are superfluous to this Plan), 10 (these are already requirements of a concession and are superfluous to this Plan). Further this clause is now out of date given the new SOP on Safety Plans and the reference to Qualmark), none of 11, and 12.

TIANZ notes that “*it is not possible to anticipate with certainty what proposals will be made for commercial services or developments within the park*”. We suggest this is even more reason why a prescriptive approach to planning and visitor use should not be implemented.

TIANZ notes that Concessions holders are “controlled” by the terms of their lease, license or permit with the Department. The Department as the sole issuer of concessions effectively manages concessionaires on its own terms. Despite this, the development of Visitor Settings within the draft Plan effectively seeks further controls both for existing concessionaires (on review of their concession) and for new concessionaires. In signalling the implementation, without consultation or research, of such restrictions across the visitor settings, the Plan effectively fails to deal with other visitors’ use of these public conservation lands.

TIANZ notes that “recreationalists” and other visitors who do not use a concessionaire, and indirectly are less “manageable” than tourism concessionaires, are effectively given preference in the current visitor settings.

TIANZ notes that the Objectives include a large section on monitoring of concessions and the possible need for alteration of operating conditions. We are particularly concerned that concessionaires may be asked to monitor their effects on other users. We note that neither the Department, nationally, nor in Fiordland National Park have an approved monitoring programme in place for many commercial activities. We support monitoring programmes but only where they involve the tourism industry in both their design and implementation.

TIANZ notes the potential use of the tender mechanism in future allocation of limited commercial opportunities. TIANZ believes the allocation of commercial opportunities is a critical national issue and the options must be consulted on separately. TIANZ does not support any Management Plan embarking on a singular allocation methodology outside of a national framework.

Action Requested

TIANZ seeks the definition of the term’s tourism concessionaire and visitors (to include recreationalists) and the addition of such to the Glossary.

TIANZ does not support limits in visitor use, based on unsubstantiated information or lack of comprehensive research. Internationally studies such as Limits of Acceptable Change (LAC) are used to involve both the local and wider community in an intensive planning process in order to manage the environmental, sociological and cultural issues in areas such as Fiordland National Park. TIANZ supports mechanisms for measuring impact and methods for addressing resulting issues. There are a number of suitable frameworks to such an approach viz. (McCool and Stankey et al)

- The interface between tourism and the environment involves primarily social questions as opposed to biotechnical ones
- Avoid the excessive reductionistic and limited perspective provided by carrying capacity based approach
- Include the wide range of stakeholders affected by tourism development choices in the planning and management processes.

We do not support the de facto implementation of visitor limits by the Department’s use of visitor management settings. TIANZ would however support an approach such as LAC in better defining visitor settings in the Fiordland National Park.

TIANZ would support a monitoring programme which is jointly managed by the Department and the tourism industry.

TIANZ does not support a singular system for allocating scarce resources (i.e. concession opportunities) in a national Park Management Plan. The issue of allocation is a national one that must be canvassed with the commercial community. For example:

- * national consistency in the approach taken (via part of the Standard Operating Procedure),

- * preference given to those that are part of industry wide initiatives
- * parameters are clearly stated in advance and contribution to conservation outcomes (past and future) are key decision drivers.

4.5 Air Access

TIANZ acknowledges that aircraft use in the Park is a potential issue as it is in other natural areas world-wide.

TIANZ notes the suggested settings and limits do not reflect the use or potential use of these areas by all visitors. There is evidence from a range of sources that some groups of visitors have a number of effects both on environmental and social components. In contrast concessionaires operate under a Department driven system that seeks to manage and mitigate associated effects.

TIANZ would support the use of the local Aircraft User's Group and it's involvement in some form of resolution of the aircraft related issues. The Mount Cook / Westland Aircraft Users Group is an example of how such relationships can work.

TIANZ notes that research suggests that first time visitors are less sensitive to aircraft impact than frequent visitors and that back country visitors are more sensitive to aircraft than front country visitors (United States National Park Service, 1994).

We also note that the research suggests the greater the expectation of aircraft presence, the lesser the annoyance. Research suggests that some people also consider aircraft activity as entertainment.

TIANZ does not support prescriptive approach in managing aircraft issues. As previously noted we support an effects or outcome based approach based on studies such as LAC. For similar reasons TIANZ does not support limits in relation to linking aircraft landings with visitor settings.

TIANZ does not support the statement that for the purposes of this plan the baseline against which aircraft landings will be measured is 2001.

Action Requested

TIANZ would support the development of a comprehensive study (such as LAC or similar) to determine the complex environmental and social relationship between aircraft and visitors.

As an interim measure, until such a study is completed, TIANZ would support the development of aircraft monitoring subject to some specific changes in the current methodology. In general TIANZ supports such monitoring where results lead to improved management techniques.

TIANZ supports the continued involvement of the local aircraft users group but does note other aircraft users from outside the area, and the wider tourism industry, will also need to be consulted on any further management changes to aircraft use.

TIANZ does not support the subsequent restrictions of aircraft use limits in the plan to 2001. Applications for new concessions or new landing sites should be treated on the potential effects of their operation – not the prescriptive approach taken in this plan. This is particularly important as it appears that current, limited monitoring does not suggest overall aircraft use is at a critical level.

TIANZ seeks clarification of how the Department intends to manage the suggested limits on air access.

4.6 Boating and Facilities

TIANZ acknowledges that boating and associated facility use in the Park is an issue as it is in other natural areas world-wide.

TIANZ notes the suggested settings and limits do not reflect the use or potential use of these areas by all visitors. There is evidence from a range of sources that some groups of visitors have a number of effects both on environmental and social components. In contrast concessionaires operate under a Department driven system that seeks to manage and mitigate associated effects.

TIANZ notes with particular concern that the outcome of the draft Plan is to effectively decrease capacity for vessels operating in the fiords through a current concession.

TIANZ supports the investigation (Department / industry) of maintaining some fiords free from tourism activity.

Action Requested

TIANZ seeks acknowledgement in this section, that the draft Plan will actively seek to integrate with existing management practices and regimes, enacted by other statutory authorities such as Southland Regional Council, and in particular the Proposed Regional Coastal Plan.

TIANZ seeks clarification of how the Department intends to manage the suggested limits on the Park by vessels.

We do not support the prescriptive approach taken in this section. Concession applications for boat access across all settings should be judged on potential effects (if any) on the environmental, social and cultural setting. The prescriptive approach should be deleted and replaced with an effects based approach.

TIANZ seeks integration of this Plan with the Proposed Southland Regional Coastal Plan (The Coastal Plan). The Coastal Plan effectively set limits to surface water activities. This Plan should recognize this and seek to integrate with that Plan. It is not good management practice to have this Plan effectively working towards a different outcome. The Plan should recognise and accept the Coastal Plan limits and work towards achieving them.

TIANZ supports the investigation (Department / industry) of maintaining some fiords free from tourism activity.

4.7 Roading, Vehicle Use and other Land Transport

TIANZ supports Objectives 1 and 2 which relate to maintaining existing road access and further developing integrated management for the Milford Road.

TIANZ supports a range of Implementation Measures where they seek to support Objectives 1 and 2.

Action Requested

Maintain Objectives 1 and 2.

Maintain Implementation Measures 5, 6, 7, 8,9,11, and 12.

4.8 Recreation Facilities

TIANZ supports the development, implementation and an appropriate public awareness campaign that matches visitor expectations with appropriate facilities, in advance of the visitors' park experience.

TIANZ supports Objectives 1, 2 and 3.

TIANZ supports a range of Implementation Measures where they seek to support Objectives 1, 2 and 3.

Action Requested

The Department should develop and implement an appropriate public awareness campaign that matches visitor expectations with appropriate facilities, in advance of the visitors' park experience.

Maintain Objectives 1, 2 and 3.

Maintain implementation measures 1, 2, 4, 5, 14,15,17,18,19,and 20.

4.9 Interpretation and Education

TIANZ supports the development and implementation of interpretation as an "*essential management tool.*"

TIANZ supports a range of Implementation Measures where they seek to support Objectives 1, 2 and the amended 3.

TIANZ wishes the Department to note the ongoing development of environmental interpretation as key component in improving the relationship between concessionaires and the Department.

Action Requested

Maintain Objective 1,2 and 3 (with alteration). Objective 3 to now read "*To work with and involve the community and tourism concessionaires in interpretation and education initiatives*".

Maintain implementation measures 1, 6, 7, 8, an amended 9 (see below) and 11.

Implementation measure 9 to be amended to read..... *Support, advice and or resource materials will be given where resources allow, to the community and tourism concessionaires, in interpretation and education initiatives*".

TIANZ wishes the Department to note the ongoing development of environmental interpretation as key component in improving the relationship between concessionaires and the Department.

TIANZ also wishes the Department to note the potential importance of environmental interpretation provided by concessionaires (to their clients) across a range of departmental values.

We note that Interpretation Unit Standards registered with the New Zealand Qualifications Authority are now available. These have been developed by the tourism industry in conjunction with the Department and should form the basis of the Objective and Implementation Methods outlined above.

4.12 Filming

TIANZ generally supports the Objective although we seek a better definition of the word “*effects*” in this Objective.

TIANZ does not support the Implementation methods outlined. TIANZ supports mechanisms for measuring impact and methods for addressing resulting issues. There are a number of suitable frameworks to such an approach viz. (McCool and Stankey et al)

- The interface between tourism and the environment involves primarily social questions as opposed to biotechnical ones
- Avoid the excessive reductionistic and limited perspective provided by carrying capacity based approach
- Include the wide range of stakeholders affected by tourism development choices in the planning and management processes.

We do not support the de facto implementation of visitor limits by the Department’s use of current visitor management settings.

TIANZ does not support policy 4.3.10 (b) as it relates to “*filming permitted within the park is consistent with visitor management settings.....and is restricted to existing access.*”

Action Sought

TIANZ seeks the inclusion of the words “*environmental, social and economic*” before effects under Policy.

TIANZ does not support the linking of current visitor management settings with visitor numbers and activities such as filming. We note that none of the current DOC management plans show consistency in their approaches to filming or other visitor issues on public conservation lands. TIANZ seeks the deletion of the phrase “*consistent with visitor management settings.*”

TIANZ seeks the removal of the above comments and replacement with “*filming applications within the park shall be based on the mitigation of potential environmental, social and economic effects.*”

4.16.1 Milford Sound / Piopiotahi

TIANZ supports the general intent to limit visitors to Milford Sound to 4,000 during the life of this Plan. TIANZ does not support the proposed sub limits during parts of the day and sees little evidence in the Plan to justify such a suggestion.

TIANZ does not support limits in visitor use, based on visitor management settings which are in turn based on unsubstantiated information or lack of comprehensive research.

TIANZ supports mechanisms for measuring impact and methods for addressing resulting issues in Milford Sound. There are a number of suitable frameworks to such an approach viz. (McCool and Stankey et al):

- The interface between tourism and the environment involves primarily social questions as opposed to biotechnical ones
- Avoid the excessive reductionistic and limited perspective provided by carrying capacity based approach
- Include the wide range of stakeholders affected by tourism development choices in the planning and management processes.

TIANZ notes the comment re spreading of visitor numbers throughout the day. TIANZ supports the intent of this comment and notes that the solution to this issue lies with the tourism industry, in particular the private sector.

TIANZ does not support the use of the term “*mass market*” in this part of the text. This term should be replaced with:

- 1) “*organised group tours*” – that is, groups who have transportation, transfers, and accommodation and activities offered for a flat rate.
- 2) “*independent visitors*” – that is, visitors whose activities are sold to them as individuals. This group forms up to 80% of the Milford Sound day market.

TIANZ notes that organised group tours remain in Milford for relatively short time periods and are on tight timetables. We further note that the bulk of visitors to Milford fall into the second category.

TIANZ notes our views on the future of Milford Sound have been previously documented in the response to the document Milford Sound Concept Plan, 1999.

TIANZ is concerned that in those comments the point was made that the Plan should remain flexible to accommodate changing trends in visitor numbers and activities. The current draft as it relates to future developments in Milford is too prescriptive.

TIANZ notes that the Plan supports visitor monitoring as a key tool in decision making for the future of Milford Sound. We do however note that the Department has previously had the opportunity to implement such monitoring but has yet to do so. We further note that any such monitoring must be based on all visitors’ perceptions – not just the perceptions of Department staff or sections of the New Zealand community. Milford Sound is an international and national visitor destination of high importance to the tourism industry.

TIANZ notes the comments on the Village Centre / Concept Plan. This is very much a local issue but in our view it is important any future developments reflect the international reputation that Milford Sound has, that such developments are flexible to accommodate changing visitor patterns, and that in the long term they are sustainable.

Action Sought

TIANZ does not support the proposed sub limits on visitors to Milford Sound. TIANZ believes industry initiatives, with an agreed (Department / industry) outcome is the most appropriate manner in which to maintain and improve the current positive perceptions of the Milford Sound “experience”.

TIANZ notes that no evidence has been presented that suggests visitors’ perceptions are being affected by current visitor numbers. The proposed sub limits should be deleted from the Plan.

TIANZ seeks the replacement of the term mass market with the term organised group tours.

TIANZ seeks the incorporation of an intensive monitoring programme, jointly managed by the Department and the visitor industry, to measure visitor satisfaction with the Milford Sound “experience”.

TIANZ seeks the actioning of our views on this issue as per our submission on the draft Milford Sound Concept Plan, 1999.

4.16.2 Milford Road

TIANZ notes that as per our comment about integration between the Southland Regional Council and the Department over management of coastal waters, the issue of integrated management will also need to apply to the Department and Transit New Zealand.

TIANZ notes the importance of the Milford Road as both an access route and attraction, to the tourism industry both regionally and nationally.

TIANZ believes the Department should reorder its priority list in proposing a three-fold approach to resolving these issues.

TIANZ supports Objectives 1, 2, 3 (with a change), and 4.

TIANZ supports Implementation Measures 1 (with a change), 2, 3 (with a change), 4, 5 (with a change), 6, 7, 9 (with a change) and 10.

Action Sought

TIANZ seeks acknowledgement in this section, that the draft Plan will actively seek to integrate with existing management practices and regimes, enacted by other statutory authorities such as Southland Regional Council, Transit New Zealand, Civil Aviation Authority, and Southland District Council.

TIANZ believes the Department should reorder its priority list in proposing a three-fold approach to resolving these issues. TIANZ believes the Department should implement the following in this priority order:

- 1) Continue to provide better information and increased liaison with the tourism industry.
- 2) Where issues of congestion and safety can be resolved by engineering solutions, agreed to by the Department, Transit NZ and the tourism industry then these should be implemented without delay.
- 3) Where Implementation Measures 1 and 2 fail to resolve issues of congestion and safety, then regulatory approaches in conjunction with agreement from Transit NZ and support from the tourism industry should be investigated. Again, treatment of congestion and resource allocation is a subject for National Principles and processes rather than a subject that should vary from Park to Park.

Maintain Objectives 1, 2, and 4. Maintain objective 3 but with the following change “*To provide sufficient opportunities for a wide range of visitor activities compatible with national park purposes*”.

Maintain Implementation Measures 2, 4, 6, 7, 9 and 10.

Amend Implementation Measures:

1) *The Department will work with Transit New Zealand (NZ), its consultants and contractors, and tourism interests to provide and implement an integrated approach to management of the road corridor.*

3) *The Department in conjunction with Transit NZ and tourism interests will review visitor signage along the route with the purpose of improving its visibility and usefulness to road users.*

5) *The Department in conjunction with Transit NZ and tourism interests, will investigate options foretc. as per original wording.*

9) *The Department will actively pursue Implementation Measures one, three and five. If these and other mechanisms outlined in this Plan, and further initiatives undertaken by the tourism industry fail to alleviate issues such as congestion at key sites, then the Department will work with Central Government and tourism interests to develop a partnership approach to these issues.*

4.16.3 Deep Cove and West Arm

TIANZ notes the developing importance of Deep Cove and West Arm as destinations and staging posts for further exploration of the fiords.

TIANZ notes that the Proposed Southland Regional Coastal Plan effectively limits the amount of commercial activity that can be completed on the waters of the fiords. We note that the

Department is seeking to limit the number of visitors to 50,000 per annum. Given that current use of Doubtful Sound is in the order of 50,000 visitors we do not support this suggested limit.

TIANZ notes that the perception of Doubtful Sound as a perceived wilderness destination is already enshrined in case law. The Plan should recognise and acknowledge this.

TIANZ notes the importance of Wilmot Pass to those tourism operations that use Doubtful Sound. TIANZ further notes that during periods of Milford Road closure Doubtful Sound provides the only alternative access to the fiords.

TIANZ supports the following Objectives: 2 (with word change) and 5 (with word change).

TIANZ does not support many of the Implementation Measures as noted below. TIANZ does support the general intent of ensuring that the perceived wilderness qualities of Doubtful Sound are retained and that the levels of visitor use remain at a level to ensure those perceptions are retained.

Action Sought

TIANZ seeks a new objective: *The Plan will actively seek to integrate with existing management practices and regimes, enacted by other statutory authorities such as Southland Regional Council, and Southland District Council in the future management of Doubtful Sound.*

TIANZ seeks acknowledgment in the Plan that Doubtful Sound is perceived as a wilderness destination.

TIANZ seeks a new Implementation Measure along the line of *“The Department acknowledges that during periods of Milford Road closure Doubtful Sound provides the only alternative access to the fiords. On these occasions the Department acknowledges there may be short term variances by tourism operators from the Implementation Measures in this plan.*

TIANZ seeks the following changes to Objectives 2 and 5:

2) That commercial operators will use Deep Cove and the Wilmot Pass roads to provide for visitor opportunities on Doubtful Sound/Patea and in other areas of the fiord.

5) To investigate opportunities for the ongoing management and funding of Wilmot Pass road so that visitor opportunities can continue and that costs are equally shared amongst all users.

TIANZ does not support the various Implementation Measures that directly effect tourism concessionaires and associated visitor activity. TIANZ does not agree with the 50,000 cap on visitors to Doubtful Sound.

TIANZ does support the general intent of ensuring that the perceived wilderness qualities of Doubtful Sound are retained and that the levels of visitor use remain at a level to ensure those perceptions are retained. In order to achieve this state, TIANZ seeks greater integration between this draft Plan and the Proposed Southland Coastal Plan. The majority of visitor activity in Doubtful Sound and beyond is centred on the coastal waters. This Plan must reflect the levels of use set, and largely agreed in that Plan. This Plan must actively reflect the Coastal Plan in terms of visitor use, and activity.

5.0 Management of Resource Use

5.10 *Rationale*

TIANZ supports the Objectives and Implementation methods outlined in this section.

Action Requested

TIANZ seeks the retention of the Objectives and Implementation methods outlined in this section.

5.12 Rationale

TIANZ supports the Objectives and Implementation methods outlined in this section.

Action Requested

TIANZ seeks the retention of the Objectives and Implementation methods outlined in this section.

6.0 Glossary

6.1 Rationale

TIANZ notes the following amendments are needed to the Glossary.

- The current definition of interpretation is not that of the officially recognised version by the New Zealand Qualifications Authority (NZQA). The Department was represented on the group that developed Interpretation Unit Standards for the Aviation Tourism and Travel Training Organisation (ATTTO) and NZQA.
- A definition for tourism concessionaires
- A definition for visitors.

TIANZ notes that other National Park Management Plans have definitions for categories such as tourism concessionaires and visitors.

Action Requested

TIANZ seeks the re-definition of interpretation to reflect the New Zealand / Australian definition that is: “*a means of communicating ideas and feelings which helps people enrich their understanding and appreciation of the world and their role in it*”.

TIANZ seeks a definition of tourism concessionaires to be inserted into the Glossary. Such a definition should be: Tourism Concessionaire “*a tourism operator licensed by the Department to undertake commercial activities on Public Conservation Lands.*”

TIANZ seeks a definition of Visitor to be inserted into the Glossary. Such a definition should be: Visitor “*a person/s undertaking activities on Public Conservation Lands.*”

David Barnes
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14th March 2003